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Of Counsel

STEVEN MITCHELL SACK

January 23, 2024

Honorable Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Foster et al v. Dula et al, 21-cv-11224 (CM)*

Dear Judge McMahon:

As Plaintiffs' counsel, I write to request that any deadlines for moving for attorney's fees where such fees may be recoverable (e.g., in connection with Defendant's motion to set aside the verdict, appeals, etc.) be adjourned until 45 days after any appeals in this matter have been decided.

This approach would streamline the process and avoid burdening the Court and the parties with multiple, piecemeal fee applications.

Further, it is at least conceivable (though, admittedly, not seemingly likely at present) that the parties could reach a resolution of this matter either before or after any appeals in this matter are decided.

There have been no prior applications for the relief requested. Defendants consent to this request.

Thank you for considering this request.

Respectfully submitted,  
*/s/ Scott A. Lucas*  
Scott A. Lucas

cc: Gerard A. Riso, Esq. (via ECF)